

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

-v.-

DERRILYN NEEDHAM,

a/k/a "Ingrid,"
a/k/a "Luisset M. Figueroa,"
a/k/a "Chandelle Lewis,"
a/k/a "Joan M. Simpson,"
a/k/a "Ingrid Needham,"
a/k/a "Carol A. Alexander,"
a/k/a "Keisha M. Tucker,"
a/k/a "Charmaine White,"
a/k/a "Desire Williams,"

LEROY BRATHWAITE,

a/k/a "Leroy K. Brathwaite,"
a/k/a "Lee Brathwaite,"

ABDHUL ODIGE,

a/k/a "B,"
a/k/a "Bam,"
a/k/a "Abdul Odige,"
a/k/a "Abdul C. Odige,"

JEAN YONEL,

a/k/a "C,"
a/k/a "Crazy,"
a/k/a "Yonel Jean,"

DONOVAN FRANCIS,

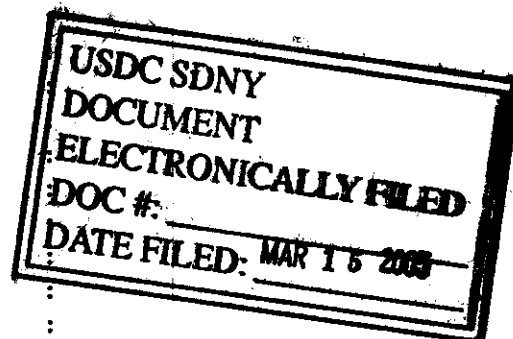
a/k/a "Brian," and

JOEY FIGUEROA,

Defendants.

SUPERSEDING
INDICTMENT

S1 04 Cr. 196 (DAB)



COUNT ONE

The Grand Jury charges:

1. In or about January 2004, in the Southern District of New York and elsewhere, DERRILYN NEEDHAM, a/k/a "Ingrid," a/k/a "Luisset M. Figueroa," a/k/a "Chandelle Lewis," a/k/a "Joan

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M. Simpson," a/k/a "Ingrid Needham," a/k/a "Carol A. Alexander," a/k/a "Keisha M. Tucker," a/k/a "Charmaine White," a/k/a "Desire Williams," LEROY BRATHWAITE, a/k/a "Leroy K. Brathwaite," a/k/a "Lee Brathwaite," ABDHUL ODIGE, a/k/a "B," a/k/a "Bam," a/k/a "Abdul Odige," a/k/a "Abdul C. Odige," JEAN YONEL, a/k/a "C," a/k/a "Crazy," a/k/a "Yonel Jean," DONOVAN FRANCIS, a/k/a "Brian," and JOEY FIGUEROA, the defendants, and others known and unknown, unlawfully, willfully and knowingly conspired to commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b) (1), to wit, the robbery of an individual believed by NEEDHAM, BRATHWAITE, ODIGE, YONEL, FRANCIS, and FIGUEROA, to be a narcotics trafficker, and would and did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b) (3).

(Title 18, United States Code, Section 1951.)

COUNT TWO

The Grand Jury further charges:

2. From at least on or about January 2, 2004 up to and including on or about January 4, 2004, in the Southern District of New York and elsewhere, DERRILYN NEEDHAM, a/k/a "Ingrid," a/k/a "Luisset M. Figueroa," a/k/a "Chandelle Lewis," a/k/a "Joan M. Simpson," a/k/a "Ingrid Needham," a/k/a "Carol A. Alexander," a/k/a "Keisha M. Tucker," a/k/a "Charmaine

White," a/k/a "Desire Williams," LEROY BRATHWAITE, a/k/a "Leroy K. Brathwaite," a/k/a "Lee Brathwaite," ABDHUL ODIGE, a/k/a "B," a/k/a "Bam," a/k/a "Abdul Odige," a/k/a "Abdul C. Odige," and JEAN YONEL, a/k/a "C," a/k/a "Crazy," a/k/a "Yonel Jean," the defendants, at least one of whom, JEAN YONEL, the defendant, is not a national of the United States, and others known and unknown, unlawfully, willfully, and knowingly combined, conspired, confederated and agreed together and with each other to seize and detain and threaten to kill, to injure, and to continue to detain another person in order to compel a third person to pay money as an explicit and implicit condition for the release of the person detained, to wit, NEEDHAM, BRATHWAITE, ODIGE and YONEL, and their co-conspirators, conspired to take a person hostage in order to compel the person's father to pay money to secure the person's release.

(Title 18, United States Code, Section 1203.)

COUNT THREE

The Grand Jury further charges:

3. From on or about January 2, 2004 up to and including on or about January 4, 2004, in the Southern District of New York and elsewhere, DERRILYN NEEDHAM, a/k/a "Ingrid," a/k/a "Luisset M. Figueroa," a/k/a "Chandelle Lewis," a/k/a "Joan M. Simpson," a/k/a "Ingrid Needham," a/k/a "Carol A. Alexander," a/k/a "Keisha M. Tucker," a/k/a "Charmaine White," a/k/a "Desire

Williams," LEROY BRATHWAITE, a/k/a "Leroy K. Brathwaite," a/k/a "Lee Brathwaite," ABDHUL ODIGE, a/k/a "B," a/k/a "Bam," a/k/a "Abdul Odige," a/k/a "Abdul C. Odige," and JEAN YONEL, a/k/a "C," a/k/a "Crazy," a/k/a "Yonel Jean," the defendants, at least one of whom, JEAN YONEL, is not a national of the United States, unlawfully, willfully, and knowingly did seize and detain and threaten to kill, to injure, and to continue to detain another person in order to compel a third person to pay money as an explicit and implicit condition for the release of the person detained, to wit, NEEDHAM, BRATHWAITE, ODIGE and YONEL took a person hostage in order to compel the person's father to pay money to secure the person's release.

(Title 18, United States Code, Sections 1203 and 2.)

COUNT FOUR

The Grand Jury further charges:

4. On or about January 4, 2004, in the Southern District of New York and elsewhere, DERRILYN NEEDHAM, a/k/a "Ingrid," a/k/a "Luisset M. Figueroa," a/k/a "Chandelle Lewis," a/k/a "Joan M. Simpson," a/k/a "Ingrid Needham," a/k/a "Carol A. Alexander," a/k/a "Keisha M. Tucker," a/k/a "Charmaine White," a/k/a "Desire Williams," the defendant, unlawfully, wilfully and knowingly, during and in relation to a crime of violence for which she may be prosecuted in a court of the United States, namely, the offenses charged in Counts One, Two, Three,

and Four, of this Indictment, did use and carry a firearm, and in furtherance of these same crimes, possessed a firearm.

(Title 18, United States Code, Sections 924(c)(1)(A)(i) and 2.)

COUNT FIVE

The Grand Jury further charges:

5. From on or about January 3, 2004, up to and including in or about January 4, 2004, in the Southern District of New York and elsewhere, LEROY BRATHWAITE, a/k/a "Leroy K. Brathwaite," a/k/a "Lee Brathwaite," ABDHUL ODIGE, a/k/a "B," a/k/a "Bam," a/k/a "Abdul Odige," a/k/a "Abdul C. Odige," and JEAN YONEL, a/k/a "C," a/k/a "Crazy," a/k/a "Yonel Jean," the defendants, unlawfully, wilfully and knowingly, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, namely, the offenses charged in Counts One, Two, Three and Four, of this Indictment, did use, and carry firearms, and in furtherance of these same crimes, possessed firearms, which firearms were brandished.

(Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.)


FOREPERSON


DAVID N. KELLEY
United States Attorney

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA

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DERRILYN NEEDHAM,
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a/k/a "C," a/k/a "Crazy,"
a/k/a "Yonel Jean,"
DONOVAN FRANCIS,
a/k/a "Brian," and
JOEY FIGUEROA

Defendants.

INDICTMENT

S1 04 Cr. 196 (DAB)

Title 18, United States Code, Section 1951
Title 18, United States Code, Sections 1951 and 2
Title 18, United States Code, Section 1203
Title 18, United States Code, Sections 1203 and 2 and
Title 18, United States Code, Sections 924(c) (1) (A) (i)

DAVID N. KELLEY
United States Attorney

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